

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

CAROLYN PLACHT,

Plaintiff,

v.

ARGENT TRUST COMPANY *et al.*,

Defendants.

Case No. 1:21-cv-05783

Hon. Ronald A. Guzman

**CONSENT MOTION TO EXTEND DEFENDANT ARGENT TRUST COMPANY'S
TIME TO RESPOND TO THE COMPLAINT**

Defendant Argent Trust Company, through its counsel, hereby respectfully moves the Court for an extension of time to respond to the Complaint, to January 14, 2022. Plaintiff has consented to this request. This unopposed motion is based on the following grounds:

1. Plaintiff filed the Complaint on October 29, 2021. ECF No. 1.
2. Defendant Argent Trust Company was served with the Complaint on November 11, 2021.
3. Plaintiff and Defendant Argent Trust Company have agreed that Argent Trust Company may file its response to the Complaint no later than January 14, 2022.
4. There is good cause for the agreed-upon extension. Defendant Argent Trust Company requires a modest extension of time to fully analyze the allegations in Plaintiff's 137-paragraph Complaint and to prepare its motion to dismiss, particularly in view of the upcoming end-of-year holidays.
5. This is the first extension that Defendant Argent Trust Company has sought of the deadline to respond to the Complaint, and Plaintiff has consented to the relief sought herein.

For the foregoing reasons, Defendant Argent Trust Company respectfully requests that the Court extend its time to respond to the Complaint to and including January 14, 2022.

Dated: November 24, 2021

Respectfully submitted,

/s/ Shannon M. Barrett

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CERTIFICATE OF SERVICE

I, Shannon M. Barrett, hereby certify that on November 24, 2021, I electronically filed the foregoing *Consent Motion to Extend Defendant Argent Trust Company's Time to Respond to the Complaint* using the CM/ECF system, which will send notification of such filing to all registered participants.

/s/ Shannon M. Barrett
Shannon M. Barrett